BAYARD

222 Delaware Avenue • Suite 900
P.O. Box 25130 • Wilmington, DE • 19899
Zip Code For Deliveries 19801

(302) 429-4208
rkirk@bayardlaw.com

ELECTRONICALLY FILED
ORIGINAL BY HAND

April 7, 2008

The Honorable Joseph J. Farnan, Jr.
J. Caleb Boggs Federal Building
844 N. King Street, Room 4124
Wilmington, DE 19801

Re: *LG.Philips LCD Co., Ltd. v. Chi Mei Optoelectronics et al*,
Case Nos. 06-726-JJF and 07-357-JJF

Dear Judge Farnan:

LG Display Co., Ltd. ("LG Display") respectfully writes in response to Chi Mei Optoelectronics Corporation's ("CMO") April 1, 2008 letter (D.I. 177). Despite two Federal Judges[1] having decided that this litigation should proceed in Delaware as one consolidated case, CMO argues that this Court should transfer the case it brought against LG Display back to Texas. CMO's request has no merit and should be denied.

- First, CMO's request is a motion to transfer in the guise of a letter to the Court that violates the Court's procedures on non-dispositive motions as stated in paragraph 5 of the Scheduling Order (D.I. 175). For this reason alone, the Court should deny CMO's request.

- Second, CMO's request is premised on the Court finding that CMO's motion to dismiss for lack of personal jurisdiction has merit. This Court noted at the Scheduling Conference on February 14, 2008 that it needed no additional briefing or discovery on this motion and had enough information to make a decision on CMO's motion. As indicated by LG Display's pending motion for sanctions against CMO, CMO's motion lacks a proper basis and LG Display renews its request that CMO's motion be denied.

[1] LG Display respectfully referrs to the Honorable T. John Ward of the Eastern District of Texas and the Honorable John C. Shabaz of the Western District of Wisconsin.

- Third, CMO incorrectly suggests that this Court's Scheduling Order needs to be amended. There is no basis for this request because CMO's patents were already in this consolidated Delaware case prior to entry of the Scheduling Order. Indeed, during the Scheduling Conference, the parties advised the Court that if CMO remains in the case, there would be 21 patents at issue. Only thereafter, with full awareness of the range of claims before it, did the Court schedule the trial for June 2, 2009.[2] Further, CMO argues that the limitation on party depositions is insufficient for CMO to assert its affirmative case on six patents in addition to defending LG Display's eight patents. CMO fails to point out that both LG Display and AUO must each complete their party depositions within the same time limit constraints. Accordingly, LG Display submits there is no need to amend the Scheduling Order.

- Finally, CMO's reference to its pending motion to strike and motion to dismiss LG Display's declaratory judgment counterclaims also has no bearing on whether this Court should consider a transfer back to Texas. LG Display's counterclaims were properly filed and therefore CMO's motion to strike should be denied. Moreover, because this Court clearly has personal jurisdiction over CMO, CMO's motion to dismiss also must be denied.

LG Display therefore requests that this Court deny CMO's latest attempt to delay this case and permit this consolidated cases to proceed in Delaware.

Respectfully submitted,

Richard D. Kirk (rk0922)

cc: Counsel as shown on the attached certificate

[2] On March 13, 2008, LG Display filed a reply to CMO USA's Answer adding declaratory judgment counts for the last two patents asserted against LG Display by CMO in the Texas case, thus bringing the total number of patents in the case to 23.

CERTIFICATE OF SERVICE

The undersigned counsel certifies that, on April 7, 2008, he served the foregoing documents by email and by hand upon the following counsel:

Philip A. Rovner
Dave E. Moore
POTTER ANDERSON & CORROON LLP
1313 North Market Street
Wilmington, DE 19899-0951

Karen L. Pascale
John W. Shaw
YOUNG CONAWAY STARGATT & TAYLOR, LLP
The Brandywine Building
1000 West Street, 17th Floor
Wilmington, DE 19899-0391

The undersigned counsel further certifies that, on April 7, 2008, he served the foregoing documents by email and by U.S. Mail upon the following counsel:

Kenneth R. Adamo
Robert C. Kahrl
Arthur P. Licygiewicz
JONES DAY
North Point, 901 Lakeside Avenue
Cleveland, OH 44114-1190

Vincent K. Yip
Peter J. Wied
PAUL, HASTINGS, JANOFSKY & WALKER LLP
515 South Flower Street, 25th Floor
Los Angeles, CA 90071

Ron E. Shulman, Esquire
Julie Holloway, Esquire
WILSON SONSINI GOODRICH & ROSATI
650 Page Mill Road
Palo Alto, California 94304-1050

M. Craig Tyler, Esquire
Brian D. Range, Esquire
WILSON SONSINI GOODRICH & ROSATI
8911 Capital of Texas Highway North
Westech 360, Suite 3350
Austin, Texas 78759-8497

/s/ Richard D. Kirk, (rk0922)
Richard D. Kirk